REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed November 15, 2005. Upon entry of the amendments in this response, claims 1, 2, 4 – 16 and 18 - 26 remain pending. In particular, Applicants have amended claims 1, 4, 6, 8 and 15, and have canceled claims 3 and 17 without prejudice, waiver, or disclaimer. Applicants have canceled claims 3 and 17 merely to reduce the number of disputed issues and to facilitate early allowance and issuance of other claims in the present application. Applicants reserve the right to pursue the subject matter of these canceled claims in a continuing application, if Applicants so choose, and do not intend to dedicate the canceled subject matter to the public. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

Rejections under 35 U.S.C. §103

The Office Action indicates that claims 1 – 5, 8 – 19 and 21 - 23 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Koss* in view of *Beckmann*. Additionally, the Office Action indicates that claims 6 – 7 and 20 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Koss* in view of *Beckmann* and further in view of *Arner*. Further, the Office Action indicates that claims 21 - 26 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Koss* in view of *Beckmann* and further in view of *Esposito*. With respect to claims 3 and 17, Applicants have canceled these claims and respectfully assert that the rejections as to these claims have been rendered moot. With respect to the remaining claims, Applicants respectfully traverse the rejections.

With respect to the pending Office Action, Applicants respectfully agree with the contention that *Koss* does not explicitly teach that the client device provides information corresponding to at least one location in a format that lacks GPS coordinates for describing

the at least one location, as this contention appears to be clear from *Koss'* disclosure.

Specifically, *Koss* discloses:

> ***Mobile computer 20 includes a positioning receiver 49 that generates varying geographical coordinates indicating the varying current location of computer 20 and its user.*** The receiver is preferably a GPS receiver and communicates with processor 21 through the brush structure already described or by some other conventional means such as a serial communications port (*Koss* at paragraph 19). (Emphasis Added).

Additionally, *Koss* discloses:

> At step 300 performed by the client, comprises rendering hyperlinked web content containing one or more hyperlinks. Step 302 comprises allowing a user to select a hyperlink from the rendered hyperlink content. ***Step 304 comprises obtaining current geographical coordinates of the mobile computer from a computer's GPS receiver.*** Step 306 comprises sending in an HTTP request to a hyperlink content network and eventually to a server, wherein the HTTP request includes the embedded GPS location parameter specified above.
>
> Step 310, performed by a server, comprises receiving the HTTP request. Step 312 comprises querying a database or performing some other procedure to obtain or create content that is appropriate for the location indicated in the HTTP request. Step 314 comprises returning the content to the mobile computer.
>
> Step 320, performed by the mobile client, comprises receiving the content. Step 322 comprises rendering the return content.
>
> The servers can utilize the geographic information in various ways depending on the nature of the resource being requested. In many cases, the geographic coordinates will be ***utilized to provide data about the area surrounding the location of the mobile client: nearby restaurants, merchants, points of interest, maps of the area, etc.***

(*Koss*, paragraphs 0039 – 0042). (Emphasis added).

As set forth above, *Koss* involves a client that provides GPS coordinate information to a server. That is, *Koss* uses GPS coordinates as an input. However, *Koss* does not teach providing GPS coordinates as an output. Specifically, *Koss* uses the input GPS coordinates to provide data corresponding to the area associated with the input GPS coordinates. Thus, *Koss* does not teach or reasonably suggest obtaining GPS coordinates from a database as generally recited in the pending claims.

Additionally, Applicants have amended the claims as will be described in detail below in a manner that renders the use of *Beckmann* improper for rejecting the pending claims. In this regard, *Beckmann* involves the use of an airborne navigational system that is used to provide real-time navigational information to aircraft pilots for providing safety of flight. Taken as a whole, therefore, it would be improper to combine the teachings of *Beckmann* with the other cited references, particularly *Koss*, because Applicants now expressly recite the limitation that accessing of the database is facilitated via the Internet. Clearly, this is not a plausible configuration for aircraft navigational systems. As such, <u>Applicants respectfully assert that the claims have been properly narrowed to define an invention that renders the use of *Beckmann* improper for formulating a rejection.</u>

In this regard, Applicants have amended claim 1 to recite:

> 1.   A method for facilitating use of the global positioning system (GPS), the method comprising:
>> ***coupling a client device to the Internet and to a GPS device;***
>> ***using the client device to access a database through the***
> ***Internet**, **wherein the client device provides information corresponding to at least one location, other than a current location, in a format that lacks GPS coordinates for describing the at least one location, the database containing the GPS coordinates that correspond to a plurality of locations***;
>> obtaining from the database the GPS coordinates corresponding to the at least one location; and
>> ***providing the GPS coordinates corresponding to the at least one location to the GPS device such that information regarding at least one of direction and distance between the current location and the at least one location is obtained.***

(Emphasis added).

Applicants respectfully assert that claim 1 is in condition for allowance. In particular, Applicants respectfully assert that the cited references, either individually or in combination, do not teach or reasonably suggest at least the features/limitations emphasized above in claim 1. That is, *Koss* does not teach or reasonably suggest at least the "using," "obtaining" and "providing" steps recited above in claim 1 (as admitted in the Office Action), and neither

Arner nor *Esposito* remedy these deficiencies. Therefore, Applicants respectfully request that the rejection of claim 1 be removed.

Since claims 2 – 7, 21 and 24 incorporate all the features/limitations of claim 1, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features that can serve as an independent basis for patentability.

With respect to claim 8, Applicants have amended that claim to recite:

> 8. A system for facilitating use of the global positioning system (GPS), comprising:
>
> *a client device coupled to the Internet and to a GPS device; and*
>
> *a database coupled to the Internet through a server device, the database containing the GPS coordinates that correspond to a plurality of locations*;
>
> *wherein the client device obtains from the database, via the Internet, the GPS coordinates that correspond to a location in response to the client device requesting the GPS coordinates associated with the location, the location corresponding to a location other than a current location and being identified by other than GPS coordinates*; and
>
> wherein the client device provides the GPS coordinates to the GPS device such that information regarding travel between the current location and the location is obtained.

(Emphasis added).

Applicant respectfully asserts that claim 8 is in condition for allowance. In particular, Applicant respectfully asserts that the combination of *Koss, Arner* and *Esposito* does not teach or reasonably suggest at least the features/limitations emphasized above in claim 8. Therefore, Applicants respectfully request that the rejection of claim 8 be removed.

Since claims 9 – 14, 22 and 25 incorporate all the features/limitations of claim 8, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features that can serve as an independent basis for patentability.

With respect to claim 15, that claim recites:

> 15.   A computer readable medium for facilitating use of the global positioning system (GPS), comprising:
> *logic configured to couple a client device to the Internet and to a GPS device, to use the client device to access a database through the Internet,* wherein the client device provides information corresponding to at least one location, other than a current location, *in a format that lacks GPS coordinates for describing the at least one location, the database containing the GPS coordinates that correspond to a plurality of locations, to obtain from the database, via the Internet,* the GPS coordinates corresponding to the at least one location, and to provide the GPS coordinates corresponding to at least one location to the GPS device such that information regarding travel between the current location and the at least one location is obtained therefrom.

(Emphasis added).

Applicants respectfully assert that claim 15 is in condition for allowance. In particular, Applicant respectfully asserts that the combination of *Koss*, *Arner* and *Esposito* does not teach or reasonably suggest at least the features/limitations emphasized above in claim 8. Therefore, Applicants respectfully request that the rejection of claim 15 be removed.

Since claims 16 – 20, 23 and 26 incorporate all the features/limitations of claim 15, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features that can serve as an independent basis for patentability.

With respect to the rejection of claims 6, 7 and 20, Applicants respectfully assert that *Arner* does not teach or reasonably suggest at least the features/limitations that have been identified as lacking in *Koss*. Therefore, Applicants respectfully assert that the combination is legally deficient for the purpose of rendering obvious claims 6, 7 and 20, and respectfully request that the rejections be removed and that these claims be placed in condition for allowance.

With respect to the rejection of claims 21 - 26, Applicants respectfully assert that *Esposito* does not teach or reasonably suggest at least the features/limitations that have been identified as lacking in *Koss*. Therefore, Applicants respectfully assert that the combination

is legally deficient for the purpose of rendering obvious claims 21 - 26, and respectfully request that the rejections be removed and that these claims be placed in condition for allowance.
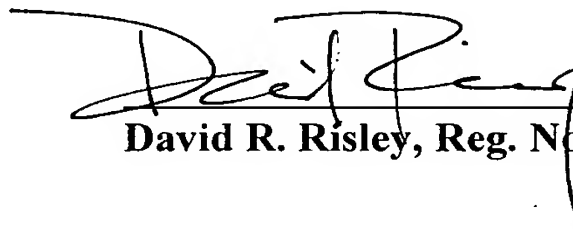
Cited Art Made of Record

The cited art made of record has been considered, but is not believed to affect the patentability of the presently pending claims.

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above,

Applicants respectfully submit that all objections and/or rejections have been traversed,

rendered moot, and/or accommodated, and that the now pending claims 1 - 26 are in

condition for allowance. Favorable reconsideration and allowance of the present application

and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a

telephonic conference would expedite the examination of this matter, the Examiner is invited to

call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

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